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Attorney for Defendant
TREVOR SANDS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA,

CASE NO. 15-017-WHO

Plaintiff,

vs.

**STIPULATION TO CONTINUE
STATUS CONFERENCE;
PROPOSED ORDER**

TREVOR SANDS

Defendant.

_____ /

Trevor Sands, by and through his counsel of record Randy Sue Pollock and Assistant United States Attorney Frank Riebli, hereby request that the status conference/change of plea presently set for Thursday, July 16, 2015 at 9 a.m. to Thursday, August 20, 2015 at 9 a.m..

The parties need additional time in order to resolve the terms of the plea agreement. Additionally, defense counsel must appear in Department 3 of the Santa Clara Superior Court on August 20, 2015 at 9 a.m. in *California State Board of Equalization vs. Violet Sarkis* [Case No. 115CV282249]. This case could not be rescheduled.

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1 Counsel is also unavailable in early August as she is scheduled for knee revision
2 surgery on July 31, 2015 and is supposed to stay at home for the first two weeks
3 following surgery.

4 It is accordingly proposed that the time period from July 16, 2015 to August 20,
5 2015 would be deemed excludable pursuant to 18 U.S.C. Section 3161(h)(7)(A), given
6 that the ends of justice served by granting a continuance outweigh the best interests of the
7 public and of the defendant in a speedy trial. Also, this time period is excludable
8 pursuant to Section 3161(h)(7)(B)(iv) for continuity of counsel.

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10 Dated: July 13, 2015

Respectfully submitted,

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12 /s/ RANDY SUE POLLOCK
13 RANDY SUE POLLOCK
14 Attorney for Defendant
15 TREVOR SANDS

16 Date: July 13, 2015

17 /s/ FRANK RIEBLI
FRANK RIEBLI
Assistant United States Attorney

18 SO ORDERED:

19 Date: July 14, 2015

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28 HON. WILLIAM H. ORRICK